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March 18, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street NW Room 222  
Washington DC 20554

In the Matter of: )  
 )  
The North American Numbering Council (NANC) )  
Recommendations Regarding the Implementation )  
of Telephone Number Portability )

CC Docket No. 95-116  
NSD File No. L-98-14

Dear Ms. Salas,

Enclosed are an original and four copies plus two public copies of the Comments of Cincinnati Bell Telephone Company in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to me at the above address or by telephone on (513) 397-6671.

Sincerely,

A handwritten signature in cursive script that reads "Patricia L. Rupich".

Patricia L. Rupich  
Regulatory Analyst

Enclosure:

CC: International Transcription Service, Inc  
Jeannie Grimes – (two copies)

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**COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY**

**I. INTRODUCTION**

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-sized local exchange carrier, submits these comments in response to the Common Carrier Bureau's Public Notice issued March 3, 1998 ("Public Notice").<sup>1</sup> The Public Notice seeks comments on the North American Numbering Council's ("NANC") recommendation that CBT be allowed to select one regional Number Portability Administration Center ("NPAC") for purposes of fulfilling its number portability responsibilities.

On June 2, 1997, CBT filed comments with the Federal Communications Commission ("Commission") requesting that CBT be permitted to select a single NPAC region.<sup>2</sup> In its Second Report and Order on Telephone Number Portability, the Commission directed the NANC to review CBT's request and recommend whether to allow local exchange carriers with

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<sup>1</sup> Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Cincinnati Bell Telephone (CBT) Request to Select One Regional Number Portability Administration Center, CC Docket No. 95-116 (rel. March 3, 1998) (hereinafter "Public Notice").

<sup>2</sup> Comments of CBT In the Matter of The North American Numbering Council Recommendations Regarding the Implementation of Telephone Number Portability, CC Docket No. 95-116, filed June 2, 1997.

contiguous operating areas that overlap more than one number portability database region to select a single NPAC.<sup>3</sup> After conducting its review, the NANC recommended to the Common Carrier Bureau ("Bureau") that CBT be allowed to select a single NPAC region, because CBT's request does not raise technical difficulties with respect to local number portability implementation or have negative financial consequences for carriers responsible for conducting the queries necessary to route calls to the proper terminating carrier.<sup>4</sup> CBT supports the NANC recommendation and urges the Bureau to approve it for the following reasons.

## II. DISCUSSION

### A. The Cincinnati MSA is Uniquely Configured

The NPAC region boundaries established by the NANC and approved by the Commission correspond to the territories established for the RBOCs. A primary reason the NPAC regions were designed to correspond to the RBOC territories was that it is easier and less costly to connect to a single, regional database, rather than multiple databases.<sup>5</sup> However, because of the diverse nature of operating territories, not all service providers will be able to connect to a single database. For example, the IXC's and many CLEC's and non-RBOC ILEC's operate in areas scattered throughout the country. The areas they serve fall into various implementation phases and will be connected to multiple NPAC's.

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<sup>3</sup> In the Matter of Telephone Number Portability, FCC 97-289, Second Report and Order and Further Notice of Proposed Rulemaking, CC Docket 95-116 (rel. Aug. 18, 1997), at paragraph 22 (hereinafter "Second Report and Order").

<sup>4</sup> See Public Notice. The NANC, however, for reasons discussed subsequently, declined to answer the general question of whether other LEC's, CLEC's and wireless carriers that overlap more than one number portability database region should be allowed to select a single NPAC, preferring instead to respond on a case-by-case basis. Id.

<sup>5</sup> NANC Local Number Portability Administration Working Group report, April 25, 1997, Section 6.6.5.2. (hereinafter "April 25, 1997 NANC Report")

CBT, however, operates in a single Metropolitan Statistical Area (“MSA”) and falls under Phase II of the Commission’s implementation schedule. CBT is the only ILEC operating in a single, contiguous area (the Cincinnati MSA) that is split between two NPAC regions.<sup>6</sup> The NANC Local Number Portability Administration Working Group report, dated November 17, 1997 (“NANC Report”), confirmed the uniqueness of CBT’s operating area when it stated that “[n]o other example has been identified of another small or mid-size wireline Service Provider facing this situation [where the contiguous operating territory is split between two NPAC regions].”<sup>7</sup> The NANC Report identified 14 out of the top 100 MSAs with territories that cross state and/or regional boundaries.<sup>8</sup> While six of these MSAs cross NPAC region boundaries, only the Cincinnati MSA is served by the same ILEC, CBT, on both sides of the boundary.<sup>9</sup>

B. Assigning the Cincinnati MSA to a Single NPAC Region Would Cause No Adverse Technical Difficulties or Negative Financial Consequences

In directing NANC to review CBT’s request, the Second Report and Order sought to determine whether CBT’s request would raise technical difficulties with respect to implementing number portability or have negative financial consequences for carriers.<sup>10</sup> If the Cincinnati

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<sup>6</sup> The Cincinnati MSA covers all of CBT’s Kentucky territory and most of its Ohio territory. CBT’s territory includes four counties in southwestern Ohio, six counties in northern Kentucky, and two counties in southeastern Indiana. Ohio is part of the Midwest NPAC region (Region #3). Kentucky is part of the Southeast NPAC region (Region #4).

<sup>7</sup> NANC Local Number Portability Administration Working Group report, November 17, 1997, Section 3.1 (hereinafter “November 17, 1997 NANC report”).

<sup>8</sup> November 17, 1997 NANC Report, Section 1.6 and Appendix B.

<sup>9</sup> November 17, 1997 NANC Report, Section 4.2. The NANC Report also examined MSAs that were split between different NPAC vendors. Since the issuance of the NANC report, vendor changes have occurred, and all regions are now served by Lockheed Martin. The fact that all regions are now served by the same vendor, however, does not impact the analysis of CBT’s requested modification. The cost savings to be realized by the modification remain the same. The only impact of having Lockheed Martin as the NPAC vendor for both regions is a lessening of the time it will take a service provider to become certified in both regions.

<sup>10</sup> Second Report and Order, at paragraph 22.

MSA is combined into one NPAC, as CBT has requested, the costs to implement local number portability will decrease for many carriers operating in both the Ohio and Kentucky portions of the MSA, and no carriers will bear increased costs. As described in section 3.4 of the NANC Report, under the requested modification, all NPA NXXs in the Kentucky portion of the Cincinnati MSA would be assigned to the Midwest NPAC region.<sup>11</sup> Furthermore, as discussed below, such a modification can be accomplished without technical difficulties.

As CBT discussed in its previous comments,<sup>12</sup> and as the NANC further elaborated upon in its report,<sup>13</sup> requiring service providers to connect with two NPAC regions would significantly add to the costs associated with number portability. These increased costs would be borne not only by CBT, but also by new Service Providers. As the NANC recognized, "[g]enerally, for MSAs like Cincinnati, new Service Providers entering this market view this as entry into a single market area. Requiring Service Providers to interface with multiple NPAC SMSs places an additional burden on them as well. While many Service Providers are entering numerous markets that would require them to interface with both NPAC vendors, this is not always the case, and increases the cost of Service Providers who may not otherwise have a need to interface with a second NPAC SMS."<sup>14</sup> Adoption of the NANC recommendations will reduce local number portability costs for such regional service providers by enabling them to connect to just

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<sup>11</sup> Since less than 15 percent of the access lines in the Cincinnati MSA are in the Kentucky portion of the MSA, it is more efficient to assign the Kentucky NPA NXXs to the Midwest region than to assign the Ohio NPA NXXs to the Southeast region.

<sup>12</sup> Comments of CBT In the Matter of The North American Numbering Council Recommendations Regarding the Implementation of Telephone Number Portability, CC Docket No. 95-116, filed June 2, 1997, at 3-4. In its previous comments, CBT estimated that it would cost an additional \$400,000 to connect to databases in two regions. Id. at 3.

<sup>13</sup> November 17, 1997 NANC Report, Section 3.2.1.

<sup>14</sup> November 17, 1997 NANC Report, Section 3.2.2.

one NPAC (i.e., the Midwest), instead of both the Midwest and Southeast NPACs. Moreover, national carriers entering the Cincinnati market will already be connected to all NPACs,<sup>15</sup> and thus will not incur any additional costs.

The NANC recommendation will also cause no technical difficulties. As indicated by the NANC Report, CBT's requested modification can be accomplished by NPAC vendors via an administrative change that does not require new software development.<sup>16</sup> As the NANC stated, "CBT's request does not raise technical difficulties with respect to local number portability implementation or have negative financial consequences for carriers responsible for conducting the queries necessary to route calls to the proper terminating carrier."<sup>17</sup> Furthermore, as already discussed, implementation of number portability within the Cincinnati MSA is simplified for the providers involved because they would not have to deal with two separate NPACs. Consequently, new providers could enter the market more quickly.

The NANC recommendation calls for CBT's requested modification to apply to the Cincinnati MSA only. Any other similar situations, according to the NANC recommendation, should be reviewed on a case-by-case basis.<sup>18</sup> CBT's request for modification was thoroughly analyzed by the Local Number Portability Administration ("LNPA") Working Group. The only concern held by the LNPA Working Group was in no way related to CBT's request, but instead was concerned with the possibility of other service providers (i.e., wireless carriers) making

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<sup>15</sup> November 17, 1997 NANC Report, Section 4.2.

<sup>16</sup> November 17, 1997 NANC Report, Section 3.4.1. Both Lockheed Martin IMS and Perot Systems, Inc. have gone on record that CBT's requested modification is a simple administrative change with no associated charge.

<sup>17</sup> Letter dated November 24, 1997 from Alan C. Hasselwander, Chairman of the NANC, to A. Richard Metzger, Jr., Acting Chief of the Common Carrier Bureau.

<sup>18</sup> Letter dated November 24, 1997 from Alan C. Hasselwander, Chairman of the NANC, to A. Richard Metzger, Jr., Acting Chief of the Common Carrier Bureau.

modification requests similar to CBT's.<sup>19</sup> Therefore, for this reason, the NANC recommended to the Bureau that the circumstances of other service providers be thoroughly analyzed on their own merits, in a separate proceeding.

### **III. CONCLUSION**

CBT's request that the entire Cincinnati MSA be assigned to the Midwest NPAC region was thoroughly examined by the NANC and found to reduce the number portability costs within the region without adversely impacting (financially or otherwise) other service providers or causing any technical difficulties. For the aforementioned reasons, CBT respectfully requests that the Bureau adopt NANC's recommendation without delay.

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<sup>19</sup> For example, wireless carriers operate within Metropolitan Trading Areas (MTAs) that cross state and regional boundaries. As the LNPA Working Group pointed out, such carriers will face the same concerns as CBT when they begin porting numbers. November 17, 1997 NANC Report, Section 3.1, 4.1.

Respectfully submitted,



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509504.01

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The undersigned hereby certifies that copies of the foregoing Cincinnati Bell Telephone Company's Comments have been sent via first class United States Mail, postage prepaid, or by hand delivery, March 18, 1998, to the persons listed on the attached service list.

  
Judy Peipmeier

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